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January 16, 2025

*Sweigert v. Goodman*, 23-cv-05875-JGK-VF

U.S. Magistrate Judge Honorable Valerie Figueredo  
U.S. District Court for the Southern District of New York  
500 Pearl Street, New York, N.Y. 10007  
Via ECF filing

SUBJ: Request for Discovery Conference

Dear Judge Figueredo,

1. May it please the Court, in light of the Defendant's recent pleadings docketed at ECF no. 199 and 201 the Plaintiff suggests that a discovery conference might assuage the Defendant's concerns about the confidentiality and privacy of discovery materials.

2. As Defendant explained at the 12/18/2024 Status Conference he feels the Plaintiff's father was a member of a U.S. Government program to repatriate missile scientists of the Third Reich into the United States under a program known as "NAZI Operation Paperclip", although this man was a Wildland Firefighter in pre-World War II Yellowstone National Park prior to entering the service of the U.S. Army's 37<sup>th</sup> Division as a combat infantryman in the South Pacific theater of operations (Guadalcanal, Fiji Islands, Leyte Gulf, and the Liberation of the Philippines). This appears to be an irrelevant issue to discovery in this legal action.

3. Likewise, the Defendant has propounded on the Plaintiff a deposition demand to interrogate the Plaintiff's ex-wife for her part in a supposed "wife swapping" arrangement with the Plaintiff's brother (George Webb), whom she has met twice. Although the Defendant has been informed on four dozen occasions the he has "the wrong woman" he persists with this request. Again, this is considered an irrelevant issue to the scope of discovery.

4. The Plaintiff has provided the Defendant with a copy of the S.D.N.Y. Model for a Protective Order in the hopes that such a document could be fashioned for a stipulated agreement and your signature. The Defendant has refused to discuss this option.

5. Therefore, a discovery conference would serve to narrow the scope of inquiry to eliminate meaningless third parties that have been accused of affiliations with the Third Reich or “wife swapping”. Further, a protective order would address the Defendant’s concerns expressed in his recent pleadings about privacy and confidentiality.

6. Lastly, the Defendant asserts that he was denied an opportunity to be heard on a matter at the 12/18/2024 Status Conference concerning the discovery related telephone call the he received while driving his vehicle in Florida. He would then be afforded such an opportunity.

7. In the interest of judicial efficiency and in light of the foregoing, the *pro se* Plaintiff herein requests such a discovery conference.

Respectfully, Signed 01/16/2025



**D.G. SWEIGERT**

### **CERTIFICATE OF SERVICE**

Hereby certified under penalties of perjury that a true copy of this pleading has been e-mailed to YouTuber Jason Goodman at [jason@21stcentury3d.com](mailto:jason@21stcentury3d.com) and [<truth@crowdsourcethetruth.org>](mailto:<truth@crowdsourcethetruth.org>)

Respectfully, Signed on 01/16/2025 (see above)

